

United States Government

Department of Energy

Rocky Flats Field Office

memorandum

DATE: JAN 27 2000

REPLY TO:
ATTN OF: AME:ESD:MH:00-01074

SUBJECT: Rocky Flats Field Office Commitment to DOE Manual 474.1-1 Interpretation

TO: Robert G. Card
President
Kaiser-Hill Company, L.L.C.

The purpose of this memorandum is to formally document the Department of Energy (DOE), Rocky Flats Field Office (RFFO) acknowledgement of the Kaiser-Hill Company, L.L.C. (K-H) interpretation of certain DOE Orders and Directives in the K-H Contract DE-AC34-00RF01904. The DOE RFFO expects K-H to conduct its business at the Rocky Flats Environmental Technology Site (Site) in accordance with all DOE Orders and Directives included in Section J, Attachment B of the contract.

The DOE also recognizes the unique nature of the closure contract for the Site and is committed to ensuring a flexible interpretation of DOE Orders and Directives to move the project to its safe and expeditious conclusion. Section J, Attachment B includes provisions for a "sunset clause," and self-deleting of requirements not applicable to the Site. Through the standard exemption process, the DOE RFFO and/or DOE Headquarters will exempt K-H from those DOE Orders and Directives and portions of such Orders and Directives on a case by case basis as appropriate.

Additionally, the DOE RFFO has considered site-specific interpretations of DOE Orders and Directives more appropriate to a closure contract. In cases where a modified interpretation would enhance the progress of closure without a significant impact on public health and safety, the environment, or site safeguards and security, DOE RFFO will implement such an interpretation.

Specifically, addressing Section 1.1.k., all nuclear material holdup will be evaluated for its potential to be Category I, but will initially be considered attractiveness level D unless determined otherwise by a qualified subject matter expert. If holdup measurements indicate greater than 0.5 gram special nuclear material (SNM) per foot, further evaluation is necessary to make a final determination of the attractiveness level (i.e., B or C rather than D). That decision will be based on process knowledge, historical measurement data, ease of recoverability of the SNM from the matrix, and expert opinion.

Section 1, Table 1-2, as is current practice and approved in the Material Control and Accountability (MC&A) plan: The contractor shall define "maximum SNM concentration (wt%) for only physical protection equivalent to Category IV" for "SNM microencapsulation in refractory compounds or in solid-dilution" as "5.0."

Section 1, Table 1-6 and 11.6.b.(1) as is current practice and approved in the MC&A plan: The contractor shall establish inventory difference control limits based on propagation of variance for both input and output measurements.

Section 11.4.b. as is current practice and approved in the MC&A plan: The SNM accountability measurements must meet the desired levels of precision and accuracy based on current RFFO Manager guidelines.

The DOE RFFO reserves the right to reevaluate or eliminate any modified interpretation and to require specific compliance with all applicable DOE Orders and Directives. Any further change to this interpretation would be subject to standard contractual change control requirements.



Paul Golan
Acting Manager

cc:
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